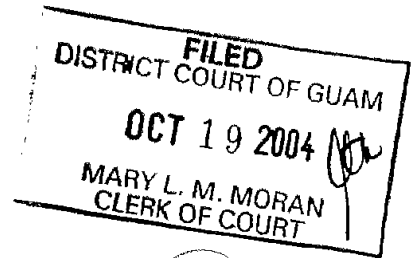


JACQUES G. BRONZE, ESQ.

LAW OFFICES OF BRONZE & TANG

A Professional Corporation
BankPacific Building, 2nd Floor
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone: (671) 646-2001
Facsimile: (671) 647-7671



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RICHARD A. PIPES, ESQ.

LAW OFFICES OF RICHARD A. PIPES

A Professional Corporation
BankPacific Building, 2nd Floor
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone: (671) 646-2001

Attorneys for Defendant Hongkong and Shanghai Banking Corporation, Ltd.

DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**DECLARATION OF JACQUES G.
BRONZE AND RICHARD A. PIPES
IN SUPPORT OF EX PARTE
APPLICATION AND CONSENT
OF LOCAL COUNSEL TO ACT
AS CO-COUNSEL**

We, the undersigned hereby state and depose as follows:

1. That we are active members and in good standing of the bar of the above entitled court.

ORIGINAL

2. That we hereby consent to act as local counsel and co-counsel for Roderick A. McLeod of the law firm of Jones Day, in connection with the above-referenced action. The basis for filing this Motion *Ex Parte* is based on the fact that there is only one month from the discovery cut-off.


3. We agree to act as local counsel so that service of papers may be made upon our offices and the law firm of Jones Day. Our address and phone numbers are contained on the first page of this document.

4. On October 18, 2004, Jacques G. Bronze faxed a letter to Anita P. Arriola, attorney for Plaintiffs, regarding this *Ex Parte* Application for Admission *Pro Hac Vice*. A true and correct copy of the letter is attached hereto as Exhibit "1." Attorney Arriola did respond to my letter.

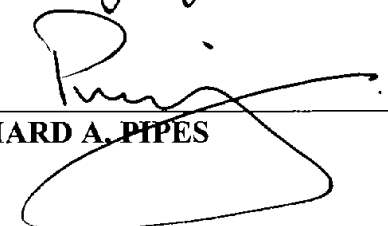
5. We understand the obligations assigned to us as local counsel pursuant to the Rules of Court.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED on this 19th day of October 2004.



JACQUES G. BRONZE



RICHARD A. PIPES

LAW OFFICES
BRONZE & TANG
A PROFESSIONAL CORPORATION
BANKPACIFIC BUILDING, 2ND FLOOR
825 SOUTH MARINE CORP DRIVE
TAMUNING, GUAM 96913

JACQUES G. BRONZE
JERRY J. TANG

TELEPHONE: (671) 646-2001
TELECOPIER: (671) 647-7671

October 18, 2004

VIA: FACSIMILE
(671) 477-9734

CONFIRMED

Anita P. Arriola, Esq.
ARRIOLA, COWAN & ARRIOLA
Suite 201, C&A Professional Bldg.
259 Martyr Street
Hagåtña, Guam 96910

Re: Sadhwani, et al. v. HSBC, et al.; Civil Case No. 03-00036

Dear Anita:

On Tuesday, October 19, 2004, HSBC will be filing an *Ex Parte* Application for Admission *Pro Hac Vice* of Roderick A. McLeod from the firm of Jones Day, located in San Francisco, California. Pursuant to Local Rule 7.1(j), please be advised that we will be submitting an *ex parte* application and declaration in support of the proposed order granting the application.

We do not know when the *ex parte* application will be heard by the Court but we will advise your office as soon as we know. Please advise if you have any objection to my *Ex Parte* Application. If you do not, I will assume that you do not wish to be present at a hearing on this matter. If this assumption is incorrect, please contact me by 12:00 p.m., Tuesday, October 19, 2004.

Please feel free to contact me if you have any questions regarding the above matter.

Best regards,


JACQUES G. BRONZE

cc *Mr C Underwood

JGB:kbn

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EXHIBIT